

Exhibit A

<p>1 2 and 3 4 THAT the questioning attorney shall provide 5 counsel for the witness examined herein with a 6 copy of this examination at no charge. 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25</p>	<p>Page 6</p> <p>1 2 New York, New York. 3 MS. DYER: For the 4 Defendant, Alex Shnaider, Karen 5 Dyer, Boies, Schiller & Flexner. 6 Also, with me is my colleague 7 Reece Dameron. 8 THE VIDEOGRAPHER: Will the 9 court reporter please swear in 10 the Witness? 11 E D U A R D S L I N I N, the 12 WITNESS herein, having been first 13 duly sworn by a Notary Public of 14 the State of New York, was 15 examined and testified as 16 follows: 17 EXAMINATION BY 18 MS. DYER: 19 Q. State your name for the 20 record, please. 21 A. Eduard Slinin. 22 Q. State your address for the 23 record, please. 24 A. 42 Dora Lane, Holmdel, New 25 Jersey 07733.</p>
<p>1 2 THE VIDEOGRAPHER: We are 3 now on the record. This begins 4 DVD number 1 in the deposition of 5 Eduard Slinin in the matter of 6 Eduard Slinin against Alex 7 Shnaider in the United States 8 District Court, Southern District 9 of New York. The deposition is 10 being held at the law office of 11 Boies, Schiller & Flexner, LLP, 12 located at 575 Lexington Avenue 13 New York, New York. Today's date 14 is September 26th, 2017, and it 15 is approximately 11:03 a.m. My 16 name is Rodolfo Duran, I am the 17 videographer. The court reporter 18 is Paige Hayden. We are both in 19 association with Magna Legal 20 Services. Will all parties 21 present please state their names 22 and whom they represent. 23 MR. LEBOWITZ: For the 24 Plaintiff, Eduard Slinin, 25 Laurence Lebowitz, 225 Broadway,</p>	<p>Page 7</p> <p>1 2 E. SLININ 3 MR. LEBOWITZ: I will be 4 requesting a copy of the 5 transcript. 6 Q. Mr. Slinin, good morning. 7 We have met before. 8 Have you ever been deposed 9 before? 10 A. Yes. 11 Q. How many times? 12 A. A couple of times. 13 Q. Do you recall when the last 14 time was that you were deposed? 15 A. It was a labor case about 16 two years ago. 17 Q. Was it a labor case 18 involving a company that you have any 19 ownership interest in? 20 A. Yes, Corporate 21 Transportation Group. 22 Q. And were you a party to that 23 case? 24 A. Yes, it was a lawsuit -- 25 drivers against my company, drivers versus independent contractors.</p>

<p>Page 14</p> <p>1 E. SLININ 2 We made a deal, Alex 3 Shnaider and me, okay, it's 4 self-explanatory. We were partners on 5 specific business by buying aircrafts 6 from Bombardier and selling them to 7 customers. We were partners and there 8 was a clear picture that where we were 9 receiving the deposits we were going 10 50/50, and then when the economy 11 turned around, some of the buyers 12 decided to come out of the contracts. 13 We then had spoken on the phone, and 14 Alex came across to me and said, 15 "Look, this is how we are going to do 16 this. We will work with the 17 Bombardier, and we will return those 18 contracts back, and we will end up 19 buying one Challenger 850 green, and 20 one Lear 60 XR, and then once we able 21 to sell those two aircrafts, we will 22 then calculate everything, we will 23 then split the money 50/50." It was 24 always like that. 25 Q. So, I want to focus on the</p>	<p>Page 16</p> <p>1 E. SLININ 2 knowledge? 3 A. Um, I believe Rob Lee put 4 them in writing. 5 Q. As you sit here today, do 6 you recall how that 6.5 million 7 dollars broke down? 8 A. Yes, I can give you a full 9 breakdown. 10 Q. Okay. 11 A. I end up buying one of the 12 aircrafts from one of the buyers with 13 Alex discussions. When we were in 14 Switzerland, I called Alex, I said, 15 "Alex, this is the circumstance, the 16 guy wants to sell one position." He 17 said, "No problem, let's buy it back." 18 He said, "I tell you what, you buy it 19 back, and I will sell it pretty quick 20 because I do have a buyer for it." At 21 that time I laid out my own money, my 22 own capital, and I purchased the 23 aircraft. Then the buyer did not 24 proceed. When things went bad, Alex 25 called me up and said, "How about</p>
<p>Page 15</p> <p>1 E. SLININ 2 damages because that maybe goes a 3 little more to your theory of 4 liability. I am just focusing on how 5 you arrived at the amount of the 6.5 6 million. 7 Is it your testimony that 8 the 6.5 million that you are claiming 9 in this lawsuit is your share of the 10 profits from the two aircrafts that 11 ultimately were delivered, that you 12 just described, one being a green 850, 13 and one being a Learjet? 14 A. Correct. 15 Q. Let me just ask you, who 16 actually did the calculation to arrive 17 at that 6.5 million; if you know? 18 A. It was Alex Shnaider, Rob 19 Lee, and myself. 20 Q. Do you know when this 21 calculation was done? 22 A. We are on the telephone 23 doing all the calculations. 24 Q. Did anybody put those 25 calculations in writing; to your</p>	<p>Page 17</p> <p>1 E. SLININ 2 this, you sign this over to me, we 3 will return this part of the 4 negotiations to Bombardier. We will 5 be able to get all the money applied 6 to the green aircraft. When the green 7 aircraft will be sold, I will return 8 all the money back to you so you are 9 not losing anything." I said, "Alex, 10 it's perfectly fine with me, we can do 11 that." That's how whole thing 12 started. So, the calculation stands 13 the following, he owes me 14 \$2,000,000.00 on my aircraft. 15 Q. When you say, "my aircraft" 16 A. The Challenger 850 that I 17 purchased from the buyer. 18 Q. The one you were referring 19 to? 20 A. I think the contract number 21 -- you can probably take a look, I 22 think it's 169 to the best of my 23 knowledge. And he said the following, 24 "You return this back to me. You sign</p>

<p style="text-align: right;">Page 42</p> <p>1 E. SLININ 2 any of that. For furthermore, if I 3 brought the buyer, or any transaction 4 took place, I would call Alex 5 Shnaider, he will then put Rob Lee, 6 and they both will do paperwork 7 because I was not handling any of the 8 paperwork.</p> <p>9 Q. That is fine. 10 I just asked if you 11 recognize the document.</p> <p>12 A. No. I mean, the company 13 Xaman I recognize. They were one of 14 the aircrafts contracts holder.</p> <p>15 Q. When you say, "Xaman," where 16 are you reading from, sir?</p> <p>17 A. Right at top, "beneficial 18 owner of Xaman Holdings Limited."</p> <p>19 Q. J-o-f-a-n?</p> <p>20 A. X-a --</p> <p>21 Q. I'm sorry.</p> <p>22 MR. LEBOWITZ: You have 23 given us a document with a Bates 24 number PO10752.</p> <p>25 Q. So, before you as Slinin</p>	<p style="text-align: right;">Page 44</p> <p>1 E. SLININ 2 familiar with an entity by the name 3 Jofan Holding? 4 A. It's one of the aircrafts 5 contracts holding. 6 Q. Do you know if Jets 7 Worldwide, LLC, ever held any 8 ownership interest in Jofan? 9 A. I would not know. I would 10 not remember. The correct answer can 11 be given to you by Rob Lee and Alex 12 Shnaider. 13 Q. Try to focus on the question 14 so the record is clear. If you need 15 to say anything else, I am sure your 16 Counsel will bring that up. 17 What about Setius, 18 S-E-T-I-U-S Technologies Limited; are 19 you familiar with that company? 20 A. I don't remember. 21 Q. Do you know if Jets 22 Worldwide had an ownership interest in 23 Setius Technologies Limited? 24 A. I don't remember. I don't 25 recall.</p>
<p style="text-align: right;">Page 43</p> <p>1 E. SLININ 2 Exhibit 2, is a reference to Xaman. 3 Are you familiar with that 4 company at all? 5 A. That was one of the 6 companies that Alex Shnaider and Rob 7 Lee I think created, whatever they 8 were doing. All the paperwork, all 9 the contractuals, all the legal, all 10 the administerial we call it, Alex 11 Shnaider and Rob Lee was handling that 12 all along, and George Rependa.</p> <p>13 Q. It indicates here that Jets 14 Worldwide, LLC, owns 30 percent of 15 Xaman; right?</p> <p>16 A. I don't recall that. 17 Q. I am asking if it is 18 indicated on the document?</p> <p>19 A. That is correct. 20 Q. It also indicates that Mr. 21 Pirumov is the beneficial owner, 22 owning 70 percent of Xaman; correct?</p> <p>23 A. Correct. 24 Q. Let me show you what we will 25 mark as -- let me ask you, are you</p>	<p style="text-align: right;">Page 45</p> <p>1 E. SLININ 2 Q. What about Stogan Assets 3 Incorporated? 4 A. Stogan is one of the 5 contracts for Bombardier. 6 Q. You are familiar with -- 7 A. Stogan was, I remember, just 8 slightly that was a name that was 9 utilized that Alex has given to me. 10 Q. Let me mark as Exhibit 3, 11 Slinin Exhibit 3. 12 (Whereupon, a confirmation 13 letter was marked as Slinin 14 Exhibit 3, for identification, as 15 of this date.) 16 Q. I placed before you sir, 17 Slinin 3, which is a confirmation 18 letter. It appears unsigned, and it 19 says, "Jets Worldwide, LLC," being the 20 shareholder of Stogan Assets 21 Incorporated, defined as the company, 22 owns 30 percent of the company's 23 shares. 24 Do you see that? 25 A. Yes, I do.</p>

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1	<p>E. SLININ</p> <p>2 Worldwide, LLC --</p> <p>3 A. Yes.</p> <p>4 Q. Let me just finish the</p> <p>5 question.</p> <p>6 "Mr. Eduard Slinin,</p> <p>7 beneficial owner;" correct?</p> <p>8 A. Yes.</p> <p>9 Q. And then on the fourth page,</p> <p>10 is that your signature there?</p> <p>11 A. That is correct.</p> <p>12 Q. It says, "name" underneath</p> <p>13 your signature, Eduard Slinin, Jets</p> <p>14 Worldwide, LLC, of the State of the</p> <p>15 Delaware; correct?</p> <p>16 A. Correct.</p> <p>17 Q. If you go back to page two</p> <p>18 of the document, sir. The first</p> <p>19 paragraph, it indicates that you are</p> <p>20 the beneficial owner as the</p> <p>21 undersigned of Xaman Holdings Limited;</p> <p>22 correct?</p> <p>23 A. That's correct.</p> <p>24 Q. Okay.</p> <p>25 And you are instructing that</p>	<p>E. SLININ</p> <p>2 A. I don't remember. Again,</p> <p>3 everything was commended by Alex</p> <p>4 Shnaider and Rob Lee.</p> <p>5 Q. Do you know why you</p> <p>6 transferred ownership back to Mr.</p> <p>7 Pirumov of Xaman Holdings Limited,</p> <p>8 sir?</p> <p>9 A. I don't remember.</p> <p>10 Q. I think you told me a few</p> <p>11 moments ago, you didn't recognize the</p> <p>12 name Jets Worldwide, LLC; is that</p> <p>13 correct?</p> <p>14 A. I can't remember. It's too</p> <p>15 many years ago that is why it did not</p> <p>16 come up. Maybe one of the companies</p> <p>17 was done for purpose of this</p> <p>18 transaction for Mr. Pirumov. I don't</p> <p>19 -- again, I was not involved in the</p> <p>20 administrative paperwork, it was done</p> <p>21 between Rob Lee, Alex Shnaider, and</p> <p>22 some proportion of Mr. Vadim</p> <p>23 Zilberman.</p> <p>24 Q. But for example, with regard</p> <p>25 to Exhibit 5 that we were just looking</p>
	Page 51	Page 53
1	<p>E. SLININ</p> <p>2 the beneficial ownership of the shares</p> <p>3 in Xaman Holdings be transferred to</p> <p>4 Mr. Pirumov; correct?</p> <p>5 A. Correct.</p> <p>6 Q. If you look at the third</p> <p>7 page, you resign as beneficial owner</p> <p>8 of the company; is that correct?</p> <p>9 A. That what -- that I</p> <p>10 resigned?</p> <p>11 Q. Yes, "Please accept this</p> <p>12 letter as my resignation as beneficial</p> <p>13 owner of the above named company with</p> <p>14 the effect from the above date</p> <p>15 hereof."</p> <p>16 Do you see that?</p> <p>17 A. Yes.</p> <p>18 Q. So, you are resigning as the</p> <p>19 beneficial owner of Xaman Holdings as</p> <p>20 of August 15th, 2008; correct?</p> <p>21 A. Correct.</p> <p>22 Q. Do you know why you</p> <p>23 transferred -- well -- strike that.</p> <p>24 Do you know how you got</p> <p>25 ownership of Xaman Holdings Limited?</p>	<p>E. SLININ</p> <p>2 at, you are not disputing that that is</p> <p>3 your signature on this document?</p> <p>4 A. It is my signature. I mean,</p> <p>5 that looks like my signature, but</p> <p>6 anything else, I can't remember.</p> <p>7 Again, Alex Shnaider would call me on</p> <p>8 the phone, "Eddy this is how we are</p> <p>9 going to do things. I need you to do</p> <p>10 this, this, and this," and I followed</p> <p>11 his instructions.</p> <p>12 Q. So, you don't have any</p> <p>13 reason to believe that you didn't</p> <p>14 sign, for example, the documents that</p> <p>15 are part of Exhibit 5?</p> <p>16 A. I can't remember.</p> <p>17 Q. Let me show you what we will</p> <p>18 mark as Slinin Exhibit 6.</p> <p>19 (Whereupon, a Limited</p> <p>20 Liability Company Agreement for</p> <p>21 Jets Worldwide, LLC, was marked</p> <p>22 as Slinin Exhibit 6, for</p> <p>23 identification, as of this date.)</p> <p>24 Q. Let me ask you to take a</p> <p>25 look at Slinin Exhibit 6, which for</p>

1 E. SLININ
2 Q. Do you share in the profits
3 of any of these other companies that
4 you contract for services with?
5 A. Of course we share the
6 profit.
7 Q. Do you actually share in the
8 overall end profits of that entity?
9 A. No, no, no. It's per ride,
10 it's per ride. Per transaction we
11 make whatever the spread is.
12 Q. You don't have an ownership
13 interest in any of the other entities
14 that you refer to as "affiliate
15 partners;" correct?
16 A. No.
17 Q. And you don't share in the
18 cost of any of the affiliate partners;
19 correct?
20 A. No.
21 Q. You have alleged in this
22 lawsuit that there is a partnership
23 between you and Mr. Shnaider; correct?
24 A. That is correct.
25 Q. Okay.

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1 E. SLININ
2 What is the name of that
3 partnership?
4 A. Eduard Slinin and Alex
5 Shnaider.
6 Q. And where is that
7 partnership located?
8 A. It was a verbal agreement in
9 New York City.
10 Q. Do you know if any documents
11 were ever filed with any governmental
12 entity in New York regarding that
13 partnership?
14 A. No.
15 Q. They were not, or you don't
16 know?
17 A. I don't know.
18 Q. What is the ownership of the
19 Eduard Slinin/Alex Shnaider
20 partnership?
21 A. It was a 50/50 total
22 agreement on all profits to be made.
23 Q. Do you know if the Eduard
24 Slinin/Alex Shnaider partnership ever
25 obtained any type of certificate to

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E. SLININ
operate in New York?

A. No.

Q. Do you know if it was required to obtain any type of certificate to operate?

A. No.

Q. You don't know?

A. I don't know.

Q. Okay.

Do you know if the Eduard Slinin/Alex Shnaider partnership that you referred to ever filed any type of tax returns with the federal authorities?

A. No.

Q. You don't know?

A. No.

Q. Do you know if the Eduard Slinin/Alex Shnaider partnership that you have alleged, ever filed any tax return with any state authority?

A. I don't know.

Q. Do you know if the Eduard Slinin/Alex Shnaider partnership ever

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